



Environmental audit checklists are designed to assist businesses by providing a low cost way of reviewing compliance with Minnesota's environmental laws and rules. Because the laws and rules are numerous and often complicated, this checklist cannot be a complete guide to your legal obligations. You may have obligations that are not covered on this checklist. If you have questions regarding the Environmental Audit Program or this checklist, please call the Small Business Environmental Assistance Program (SBEAP) at 651-282-6143 or 800-657-3938.

Date of audit _____

Company _____

Completed by/Title _____

Environmental Audit Program Participation

A check mark in any of the boxes indicating that a requirement is not being met designates a violation of one or more regulations. To participate in the Environmental Audit Program, submit a report of your findings to the Minnesota Pollution Control Agency (MPCA). The Report Inventory form lists items that need to be included in the report and meets the audit report requirements. You do not need to submit a copy of this checklist.

Answer each question unless specifically directed otherwise.

1. Do you have unusable antifreeze that was removed from a motor or vehicle?

- ☐ Yes You need to complete this checklist. You also need to complete the *Vehicle Maintenance Providers: Audit Checklist - Air Quality*. For more information, call the SBEAP and ask for Hazardous Waste fact sheet #4.02, *Managing Waste Antifreeze*, or find it at <http://www.pca.state.mn.us/publications/w-hw4-02.pdf>.
- ☐ No You do not need to complete this checklist.

Hint: Antifreeze is a recyclable resource that can be cost-effective for you to reuse or recycle. Reuse may be as simple as draining it carefully, storing it in a clean container, and returning it to the vehicle it came from. You can make adjustments if necessary. Recycling may be necessary if it can't be directly reused. We recommend using locally available recycled antifreeze that meets quality standards and can be less expensive than the price of new.

Storing and Shipping

2. Do you store waste antifreeze in a manner that will prevent a release to land or water by following these guidelines?

- Store the waste antifreeze in a container compatible with the waste, such as a metal or poly drum or tank.
 - Mark the container with the words *Antifreeze for Recycling*.
 - Inspect regularly for leaking or inadequate containers.
 - Clean up any leaks promptly and repackage the antifreeze in a container that does not leak.
 - If storing outdoors, use an impermeable surface, secondary containment, and protection from weather conditions to help ensure antifreeze does not accidentally spill on the ground or reach storm sewers or other water bodies.
- ☐ Yes You meet these requirements.
- ☐ No You are not meeting these requirements.

3. If you ship any waste antifreeze do you:

- Send it to a recycling, disposal, or reclamation facility?
 - Ensure that containers are closed and secure for any load you transport in your business or personal vehicle?
 - Send along, if transporting in your own vehicle, a waste tracking invoice that contains the following information:
 - your business name and address
 - contact person at your business
 - name and address of the facility to which you are shipping
 - date the shipment is initiated
 - description of the waste
 - quantity/amount of waste shipped
 - Use a manifest, if the waste passes through a state requiring a manifest or if you are shipping to a licensed hazardous waste disposal facility?
 - Keep copies of waste tracking invoices and manifests on site for at least three years? (For protection from future liability, we recommend that you never discard them.)
- ☐ Yes You meet these requirements.
- ☐ No You are not meeting these requirements.

Reporting/Licensing

4. Is your waste antifreeze recycled following the above guidance for storing and shipping?

- ☐ Yes Your antifreeze need not be tested.
- ☐ No You can assume your waste is hazardous or arrange for testing using the Toxicity Characteristic Leaching Procedure (TCLP) to determine if it is hazardous for benzene or heavy metals.

5. Do you plan to test your waste antifreeze to determine if it is a hazardous waste?

- ☐ Yes
- Submit a representative sample for TCLP testing.
 - If according to TCLP results, the waste has any test values above any of the maximum allowable concentrations listed in the table below, it is a hazardous waste. Manage it according to hazardous waste rules. Complete the *Vehicle Maintenance Providers: Audit Checklist - Hazardous Waste*.
 - If according to TCLP results, the waste has all test values below the maximum allowable concentrations listed in the table below, it is not a hazardous waste. Recycling is recommended.
 - Keep records of any tests or determinations used in the evaluation of this waste for at least three years. (For protection from future liability, we recommend that you never discard them.)

Hazardous Waste Code	Contaminant	Maximum Allowable Concentration (milligrams per liter)
D004	Arsenic	5.0
D005	Barium	100.0
D006	Cadmium	1.0
D007	Chromium	5.0
D008	Lead	5.0
D009	Mercury	0.2
D010	Selenium	1.0
D011	Silver	5.0
D018	Benzene	0.5

- ☐ No Continue to next question.

6. Do you collect waste antifreeze separately from other wastes, for example, used oil?

- ☐ Yes Continue these practices.
- ☐ No Correct your storage practices.

7. For any waste antifreeze you recycle on site, have you tested associated sludge wastes to determine if they are hazardous?

☐ Yes

- If your test results show that they are hazardous wastes, manage them according to the hazardous waste rules and complete the *Vehicle Maintenance Providers: Audit Checklist - Hazardous Waste*.
- If your test results show that they are not hazardous wastes:
 - Find out where your hauler plans to take your solid waste.
 - Contact SBEAP to verify that the disposal facility has an MPCA permit.
 - Contact the operator of the disposal facility to find out what is and is not acceptable material at this site. Verify that the sludge is an acceptable material.
 - Store separately, in marked containers, for the hauler.
 - Keep records of any tests or determinations used in the evaluation of this waste for at least three years. (For protection from future liability, we recommend that you never discard these records.)

☐ No Have your sludge waste tested.

8. Do you filter your waste antifreeze?

☐ Yes Drain all filters for at least 24 hours or until they are not dripping.

☐ No **Skip to question 11.**

Hint: *Filters used in the recycling process, whether yours or a service contractor's, last longer if oil and other obvious contaminants are not processed. Do what you can to segregate good used antifreeze from old, oily, scaly, or dirty antifreeze.*

9. Do you use metal-cased filters?

☐ Yes

- Puncture them, if needed to aid draining.
- Send drained filters with used oil filters for recycling. Check with your oil filter hauler first.
- If you can not do that, mix well-drained filters with industrial solid waste destined to be burned. Check with the burner-operator to make sure they can accept these filters.
- If you can not do that, mix well-drained filters with industrial solid waste destined for a landfill. Check with the landfill operator to make sure they can accept these filters.

☐ No Continue to the next question.

10. Do you use wound-polypropylene filters?

☐ Yes

- Place them with used oil-sorbent materials (paper towels and oil-dry materials) that will be burned for energy recovery.
- If you cannot do that, mix well-drained filters with industrial solid waste destined to be burned. Check with the burner operator to make sure they can accept oil filters.
- If you cannot do that, mix well-drained filters with industrial solid waste destined for a landfill. Check with the landfill operator to make sure they can accept oil filters.

☐ No **See question 9.**

Discharging to a Sanitary Sewer

Note: *Antifreeze **cannot** be discharged to a septic system or storm sewer.*

11. Do you generate 600 gallons or more per year of waste antifreeze?

☐ Yes Do not discharge waste antifreeze to a sanitary sewer. Your management options include on-site or off-site recycling or off-site disposal. Before recycling or disposal, store the waste in a closed and marked container.

☐ No Continue to the next question.

12. Do you generate *less than 600 gallons per year* of waste antifreeze?

- ☐ Yes You are allowed to discharge waste antifreeze to the sanitary sewer system if you follow these steps:
- Ensure that your discharge goes to a sanitary sewer system that is connected to a wastewater treatment plant.
 - Make sure the operator of your wastewater treatment system allows the discharge of waste antifreeze to the sewer. A local wastewater treatment plant may prohibit the discharge of antifreeze to its system. (In the Twin Cities Metropolitan Area, the Metropolitan Council Environmental Services wastewater treatment system, allows small amounts of motor vehicle antifreeze to be discharged to the wastewater treatment plant.)
 - Keep records of the amount of waste antifreeze generated.
 - Retain these records on site and make them available for inspection for at least three years. (For protection from future liability, we recommend that you never discard them.)
- ☐ No **See question 11.** Do not discharge waste antifreeze to a sanitary system.

Contacts

MPCA Web site <http://www.pca.state.mn.us>

Small Business Environmental Assistance Program 651-282-6143
http://www.pca.state.mn.us/programs/sbap_p.html 800-657-3938

Minnesota Technical Assistance Program (MnTAP) 612-624-1300
<http://www.mntap.umn.edu> 800-247-0015

Metropolitan Counties Hazardous Waste Staff

Anoka County 763-422-7093
<http://www.co.anoka.mn.us>

Carver County 952-361-1800
<http://www.co.carver.mn.us>

Dakota County 952-891-7557
<http://www.co.dakota.mn.us>

Hennepin County 612-348-3777
<http://www.hennepin.us>

Ramsey County 651-266-2400
<http://www.co.ramsey.mn.us>

Scott County 952-496-8475
<http://www.co.scott.mn.us>

Washington County 651-430-6655
<http://www.co.washington.mn.us>

Publicly-Owned Treatment Works – Sanitary Sewer Authorities

Metropolitan Council Environmental Services 651-602-4736

Others – Call local wastewater treatment facility